

# SPILL INCIDENT NOTIFICATION REPORT

Regional Case Number: VA94 462

Reported (mm/dd/yy): <u>11-9-93</u>	Time (H:M): <u>1030</u>	Multiple Report: <input type="checkbox"/>	Regional Tim
Recorded By: <u>Terry Stinson</u>	Multiple Regional Case Number:		
Through NRC: <input type="checkbox"/>	NRC Case Number: <u>None</u>	SSI Report: <input type="checkbox"/>	CR Number:
<b>A. REPORTER</b> Confidentiality Requested: <input type="checkbox"/> *Reported By: <u>Senator Robb</u> Organization Name: <u>U.S. Senate (see attached letter)</u>			
Organization: (Check One) <input type="checkbox"/> Discharger <input type="checkbox"/> Public <input checked="" type="checkbox"/> State <input type="checkbox"/> Local <input type="checkbox"/> Federal <input type="checkbox"/> Unknown			
*Address:		*Phone: ( ) ext:	
City: <u>Wash.</u>	County:	State: <u>DC</u>	Zip:
<b>B. DISCHARGER</b> Same As A <input type="checkbox"/> Organization: (Check One) <input type="checkbox"/> Private Co <input type="checkbox"/> Public <input type="checkbox"/> State <input type="checkbox"/> Local <input type="checkbox"/> Federal <input checked="" type="checkbox"/> Unknown			
Discharger Name: <u>Unknown</u>		Phone: ( ) ext:	
Contact Name:		2nd Phone: ( ) ext:	
Address:		Facility ID Number:	
City:	County:	State:	Zip:
<b>C. INCIDENT LOCATION</b> Same As A <input type="checkbox"/> Street or Approx. Location: <u>along the Roanoke River from Roanoke to Salem VA</u> Same As B <input type="checkbox"/>			
City: <u>Roanoke / Salem</u>	County: <u>Roanoke</u>	State: <u>VA</u>	Zip: Milepost:
<b>D. DATE</b> Discovery Date (mm/dd/yy): <u>11/09/93</u> Spill Date (mm/dd/yy): Spill Time (H:M):			
<b>E. MATERIAL</b> Material Type: (Check One) <input checked="" type="checkbox"/> Unknown <input type="checkbox"/> Oil <input type="checkbox"/> Haz Sub <input type="checkbox"/> Other			
Material Name	CHRIS	CAS No.	UN DOT No. Quantity Units (Circle One) Quantity In Water
1. <u>unk</u>	<u>UNK</u>		<u>unk</u> lb bbl drn unk gal ton oth
2.			lb bbl drn unk gal ton oth
3.			lb bbl drn unk gal ton oth
<b>F. SOURCE</b> Source of Spill: (Check Any) <input type="checkbox"/> Highway <input type="checkbox"/> Railway <input type="checkbox"/> Pipeline <input type="checkbox"/> UST <input checked="" type="checkbox"/> Fixed Facility <input type="checkbox"/> Other <input type="checkbox"/> Air Transport <input type="checkbox"/> Vessel <input type="checkbox"/> Offshore <input type="checkbox"/> AST <input type="checkbox"/> Unknown			
Vehicle ID or Carrier No.:	Number of Tanks:	Tank Capacity:	Tank Units: (Circle One) lb bbl drn unk gal ton oth
Source Description: <u>landfills and facilities along the river / suspect</u>			
<b>G. MEDIUM</b> Medium Affected: (Check Any) <input type="checkbox"/> None <input checked="" type="checkbox"/> Land <input type="checkbox"/> Groundwater <input type="checkbox"/> Other <input type="checkbox"/> Air <input checked="" type="checkbox"/> Water <input type="checkbox"/> Within Facility <input type="checkbox"/> Unknown			
Waterway Affected: <u>Roanoke River</u>			
<b>H. CAUSE</b> Reported Cause: (Check Any) <input type="checkbox"/> Transportation Accident <input type="checkbox"/> Operational Error <input checked="" type="checkbox"/> Dumping <input type="checkbox"/> Other <input type="checkbox"/> Equipment Failure <input type="checkbox"/> Natural Phenomenon <input type="checkbox"/> Unknown			
Cause Description: <u>Suspect dumping</u>			
<b>I. DAMAGE</b> No. of Injuries: <input type="checkbox"/> None No. of Deaths: <input type="checkbox"/> None Property Damage > \$50,000: <input type="checkbox"/>			
<b>J. ACTIONS</b> Evacuation: <input type="checkbox"/> Response Actions Taken: <u>Assessment to be performed by Roanoke and Site Assessment - Site Action resulted from this notification</u>			
<b>K. NOTIFIED</b> Caller Has Notified: (Check Any) <input type="checkbox"/> State/Local <input type="checkbox"/> Discharger <input type="checkbox"/> USCG <input type="checkbox"/> Other <input type="checkbox"/> Unknown			
Agency Name:			
<b>L. COMMENTS</b> Comments: <u>Site to be named Roanoke Flood Control</u>			
Additional Information (See Reverse Side) <input type="checkbox"/>			
<b>M. RESPONSE AND EVALUATION</b> Response Comments:			
Agency Name: <u>EPA</u> (Check One) <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Discharger <input type="checkbox"/> Federal <input checked="" type="checkbox"/> EPA <input type="checkbox"/> Other <input type="checkbox"/> Unknown			
Agency Name: (Check One) <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Discharger <input type="checkbox"/> Federal <input type="checkbox"/> EPA <input type="checkbox"/> Other <input type="checkbox"/> Unknown			
Agency Name: (Check One) <input type="checkbox"/> Local <input type="checkbox"/> State <input type="checkbox"/> Discharger <input type="checkbox"/> Federal <input type="checkbox"/> EPA <input type="checkbox"/> Other <input type="checkbox"/> Unknown			





ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107

NOV 15 1994

**SUBJECT:** Recommendation for Determination of  
Imminent and Substantial Endangerment  
Walnut Avenue Lead Site  
Roanoke, Virginia

**FROM:** Richard M. Fetzer, On-Scene Coordinator (3HW32)  
Western Response Section

**TO:** Abraham Ferdas, Associate Division Director (3HW02)  
for Superfund Programs

Because of the factors outlined below, I have determined that a threat to the public health or welfare or the environment exists at the Walnut Avenue Lead Site, and I recommend that a finding be made that there may be an imminent and substantial endangerment to the public health or welfare or the environment because of an actual or threatened release of a hazardous substance at or from the Site.

1. Site Name and Location: Walnut Avenue Lead Site  
Roanoke, Virginia

2. Owner/Operator: Cycle Systems

Cycle Systems reportedly purchased the Walnut Avenue property at a public auction in the early 1980's.

3. Population Information/Area Description:

The Site is situated adjacent to the Roanoke River in the City of Roanoke. The immediate area is industrial, but surrounded by densely populated urban areas.

4. Access is restricted by a fence, except for some areas along the river.

5. Coordination with Other Authorities:

  X   State Contact: Steve Wright, VADEQ Roanoke  
  X   Local Contact: John Peters, City of Roanoke  
  X   Other Contact: Jim Carper, ACOE

EPA assistance was requested by both the City of Roanoke and the U.S. Army Corps of Engineers in assessing potential contamination associated with the joint flood control project. Representatives of Virginia Department

of Environmental Quality also participated in meetings with the City and the Corps related to this assessment.

6. Site Characteristics:

The Walnut Avenue Lead Site is used by an active recycling business, situated adjacent to the Roanoke River near the Walnut Avenue bridge in an industrialized section of downtown Roanoke, Virginia. Originally, the property was reportedly used in the manufacture of steel I-beams, but is now used primarily as a storage yard for various materials and equipment.

The Site is approximately 5 acres and fenced with a gate. Several adjoining buildings are onsite (see attached Site diagram). Hazardous substances specifically described below are located near the building and in some drainage areas, which were sampled.

7. Hazardous Substance(s) Present:

Prior to the Sale of the property to Cycle Systems, an environmental assessment of the property was conducted for the land owner, Dominion Bank (currently First Union Bank). This assessment revealed the following 3 areas of contamination: a slag/paint area adjacent to the river, an area of heavy metals contamination under a roof cover (allegedly area of former steel fabrication), and potential underground storage tank contamination. Following the purchase, Cycle Systems reportedly spent an estimated \$90,000 to conduct cleanup efforts on the property.

Analytical data from the EPA sampling assessment revealed elevated levels of lead (5,110 ppm Sample CSS-32) in onsite soils; elevated levels of lead (4,660 ppm Sample CSS-30) in a drainage area near the drum storage area; in addition, elevated lead levels of lead (1,080 ppm Sample CSS-28) were detected in a drainage path leading directly to the Roanoke River, approximately 10 feet from the sampling location. Further sampling may be necessary to quantify the amount of contaminated soils present onsite. Lead is defined as a hazardous substance pursuant to CERCLA Section 104(14) and is listed in 40 CFR Part 302.4 as a hazardous substance. The Removal Action Level for lead is currently 1,000 ppm for industrial properties.

8. Threat to Public Health or Welfare or the Environment:  
(References are to Section 300.415 of the NCP)

## A. 300.415 (b)(2)(i)

"Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants"

The presence of elevated levels of lead detected both onsite and in drainage pathways leading directly to the Roanoke River create the potential for direct contact to any person or animal that comes onsite; the facility is currently active, thus posing a threat to any employees who may come into contact with the contaminated soils. In addition, runoff from the Site enters directly into the Roanoke River creating a threat to aquatic organisms. Thus, there is potential exposure of humans, animals and fish in the immediate area of the Site. In addition, residents using the river for recreational purposes such as boating and fishing could be exposed since they are not restricted from access to the river.

## B. 300.415 (b)(2)(ii)

"Actual or potential contamination of drinking water supplies or sensitive ecosystems"

With the Site being adjacent to the Roanoke River, heavy rains or flooding conditions could cause contaminants to migrate from the Site, thus impacting the river and its aquatic organisms. Although no drinking water supplies have been identified downstream, sediment dwelling organisms and fish may be contaminated due to offsite migration of lead-contaminated soil.

## C 300.415 (b)(2)(iv)

"High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface, that may migrate"

The Removal Assessment revealed elevated concentrations of lead in the surface soils collected from both onsite and in drainage pathways; runoff from this Site directly enters the Roanoke River creating the potential for further contaminant migration. Levels onsite were found to be 5 times the Removal Action Level (RAL) for lead. The lead level in soil in the drainage pathway is 1,080 ppm and is above the RAL.

## D. 300.415 (b)(2)(v)

"Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released"

Since the Site is situated adjacent to the Roanoke River, the potential for flooding to occur exists; in addition, floods have occurred in the past which have left much of the City of Roanoke under several feet of water. Conditions such as this could probably result in offsite migration of contaminants.

## E. 300.415 (b)(2)(vii)

"The availability of other appropriate Federal or State response mechanisms to respond to the release"

EPA assistance at this Site was requested because the City of Roanoke and the Army Corps of Engineers had exhausted their resources and could not afford further investigation at this time at the sites associated with the Flood Reduction Project including Walnut Avenue Lead Site. In addition, State or City funding is unavailable at this time to conduct any removal activities.

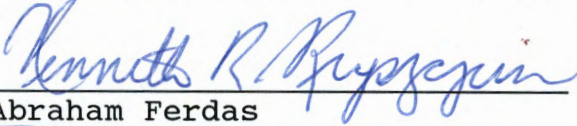
## 9. List of Supporting Documents:

- A. Roanoke River Flood Reduction Project - Phase II A Interim Report, January 8, 1993, Prepared for City of Roanoke by Dewberry and Davis.
- B. Roanoke River Flood Reduction Project - Proposed Allowable Concentrations; June 24, 1993; Prepared for City of Roanoke by Dewberry and Davis.
- C. Roanoke River Control Site Analytical Package; June 1994; Prepared for EPA by Roy F. Weston Technical Assistance Team (TAT).

## Action by the Approving Official:

I have reviewed the above-stated facts and based upon those facts and the information compiled in the documents described above, I hereby determine that the release or threatened release of hazardous substances at and/or from the Site presents or may

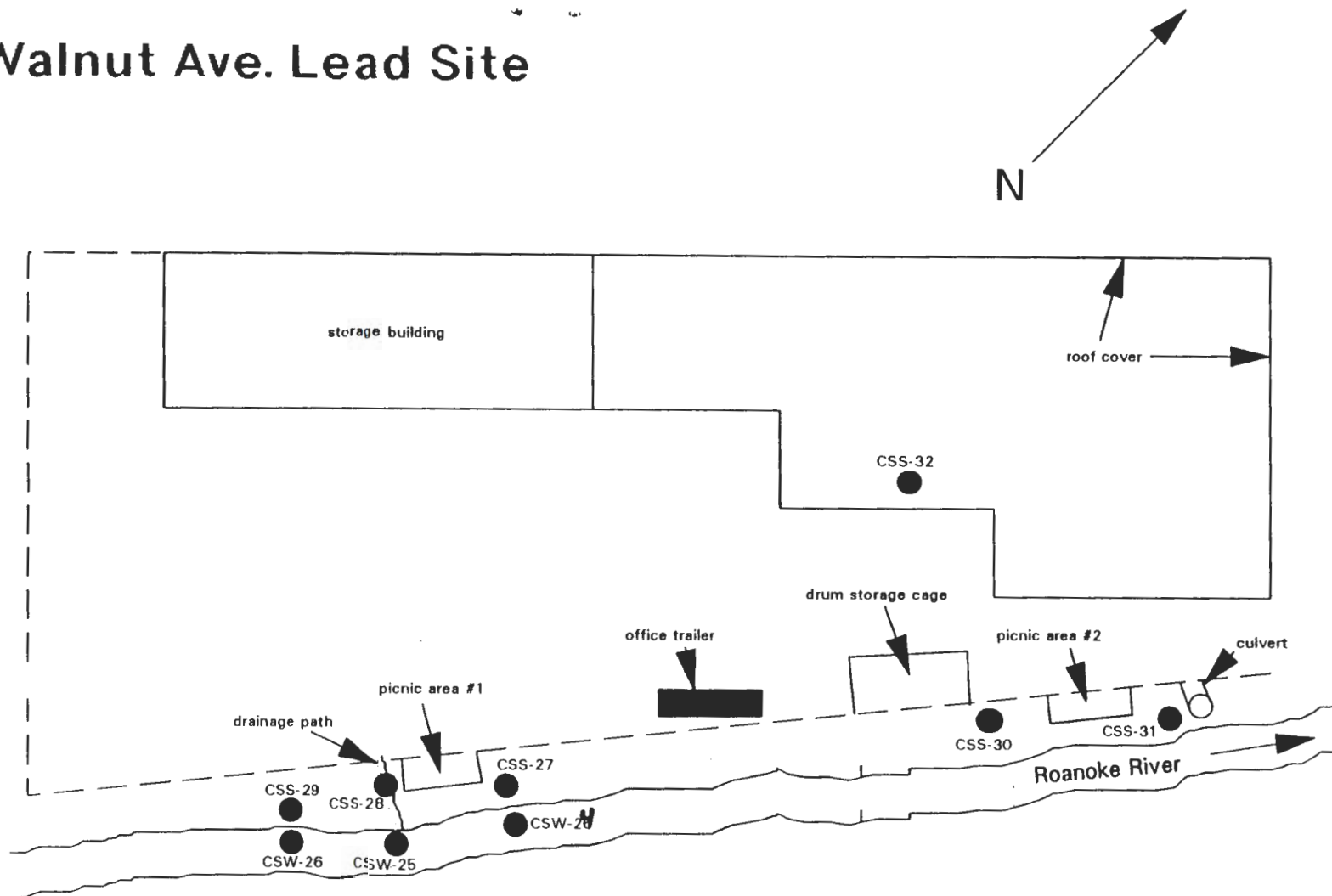
present an imminent and substantial endangerment to the public health or welfare or to the environment.



*for* Abraham Ferdas  
Associate Division Director  
for Superfund Programs

11/15/94  
Date

# Walnut Ave. Lead Site



Sample Location Map

Not To Scale  
Drawn By Region III TAT



POLREP # 1  
CYCLE SYSTEMS  
WALNUT AVENUE LOCATION  
ROANOKE, ROANOKE COUNTY, VA

ATTN: CHARLIE KLEEMAN, DEBORAH DIETRICH

I. SITUATION (AS OF 1700 HOURS JUNE 13, 1994)

- A. FROM FEBRUARY 15, 1994 TO FEBRUARY 17, 1994, OSC FETZER AND TAT CONDUCTED A SAMPLING ASSESSMENT TO ASSIST THE CITY OF ROANOKE AND THE U.S. ARMY CORPS OF ENGINEERS (ACOE); THE ASSESSMENT INVOLVED 18 PROPERTIES (INCLUDING CYCLE SYSTEMS) SITUATED ALONG THE ROANOKE RIVER WHICH ARE PROPOSED FOR INCLUSION IN A FLOOD REDUCTION PROJECT DESIGNED TO MINIMIZE DAMAGE CAUSED TO FLOOD PRONE AREAS ALONG THE RIVER.
- B. ACCORDING TO INFORMATION FROM THE FILE, A SOIL CLEANUP WAS CONDUCTED FOLLOWING THE CYCLE SYSTEMS' PURCHASE OF THE PROPERTY, WHICH WAS FORMERLY OPERATED AS A STEEL FABRICATION PLANT. CYCLE SYSTEMS CURRENTLY USES THE PROPERTY FOR STORAGE AND MAINTAINENCE PURPOSES.

II. ACTIONS TAKEN

- A. UPON RECEIPT OF THE ANALYTICAL PACKAGE FOR THIS PROJECT, TAT BEGAN REVIEWING AND SUMMARIZING THE DATA; DURING THE REVIEW PROCESS, TAT DISCOVERED THAT 3 SOIL SAMPLES COLLECTED FROM THE CYCLE SYSTEMS PROPERTY SHOWED ELEVATED LEAD LEVELS (UP TO 5,110 PARTS PER MILLION), INCLUDING ONE SAMPLE FROM A DRAINAGE PATH LEADING FROM THE SITE DOWN TO THE RIVER. OSC FETZER DETERMINED THAT THIS CONCENTRATION OF LEAD IS A POTENTIAL THREAT TO THE ENVIRONMENT, PARTICULARLY THE WATER QUALITY OF THE ROANOKE RIVER. IT ALSO IS A POTENTIAL THREAT TO THE PUBLIC HEALTH OF PERSONS, PARTICULARLY CHILDREN, WALKING ALONG THIS AREA OF THE RIVER BANK.
- B. A MEETING WAS HELD IN THE CITY OF ROANOKE TO DISCUSS THE RESULTS AND POSSIBLE FUTURE ACTIONS BY EPA; IN ADDITION TO OSC FETZER AND TAT, THE MEETING INCLUDED REPRESENTATIVES OF THE CITY OF ROANOKE, ACOE, AND THE VIRGINIA DEPT OF ENVIRONMENTAL QUALITY. DURING THE MEETING, OSC FETZER STATED THAT THE DATA FOR ALL 18 PROPERTIES ADDRESSED IN THE EPA/TAT ASSESSMENT WOULD BE PASSED ALONG TO BOTH THE ENFORCEMENT AND SITE ASSESSMENT BRANCHES OF EPA; IN ADDITION, HE INFORMED MEETING REPRESENTATIVES OF THE SUPERFUND REMOVAL PROCESS.
- C. OSC FETZER DISCUSS ENFORCEMENT PROCESS WITH EOSC DODD AND AGREED TO REVIEW ENFORCEMENT PROGRESS WITHIN 60 DAYS.



### III. FUTURE PLANS

- A. OSC FETZER TO PASS INFORMATION ALONG TO EPA ENFORCEMENT AND SITE ASSESSMENT SECTIONS FOR FURTHER INVESTIGATION.
- B. OSC FETZER TO ASSIST IN ANY POSSIBLE FUTURE ACTIONS BY EPA.
- C. OSC FETZER TO BEGIN PREPARATION OF DRAFT ACTION MEMO.
- D. EOSC DODD TO BEGIN DISCUSSIONS WITH PROPERTY OWNER.

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RICH FETZER, OSC  
U.S. EPA REGION III  
PHILADELPHIA, PA

POLREP #2 (REVISED - FORMALLY NO. 3)

CYCLE SYSTEMS LEAD SITE

2580 BROADWAY STREET SW

CITY OF ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

I. SITUATION (1200 HRS, WEDNESDAY, JULY 13, 1994)

- A. ANALYTICAL RESULTS FROM SAMPLES COLLECTED DURING THE SITE ASSESSMENT FEBRUARY 15-17, 1994 INDICATED ELEVATED LEVELS (4000-5000 PPM) OF LEAD IN ON-SITE SOILS.
- B. ADDITIONAL INFORMATION IS NEEDED WITH RESPECT TO SITE OWNERSHIP AND PRP IDENTIFICATION.
- C. PERSONNEL ON SITE: EPA-2, CYCLE SYSTEMS-3

II. ACTIONS TAKEN

- A. OSC DODD AND CIVIL INVESTIGATOR (CI) RICHARDSON MOBED TO SITE TO CONDUCT RECORDS REVIEW, MEET WITH COMPANY OFFICIALS AND TO VIEW SITE.
- B. OSC AND CI REVIEWED TAX MAPS AND PROPERTY DEEDS TO DETERMINE CURRENT AND FORMER OWNERSHIP. CYCLE SYSTEMS INC. IS THE CURRENT OWNER OF THE PROPERTY WHERE THE SAMPLES WERE COLLECTED. THE PROPERTY WAS PURCHASED BY CYCLE SYSTEMS IN 1988.
- C. OSC AND CI MET WITH COMPANY OFFICIALS AND PRESENTED COPIES OF THE SAMPLE RESULTS AND A MAP OF SAMPLE LOCATIONS. OSC AND CI INFORMED CYCLE SYSTEMS OF THEIR POTENTIAL LIABILITY UNDER CERCLA.
- D. CYCLE SYSTEM REPRESENTATIVES INDICATED THAT THE COMPANY HAD PERFORMED A REMOVAL OF LEAD CONTAMINATED SOILS AT THE SITE PRIOR TO COMPLETION OF THE PURCHASE OF THE PROPERTY IN MARCH 1988. THE SOURCE OF THE LEAD IN THE SOIL ALLEGEDLY WAS DUE TO LEAD BASED PAINTING OPERATIONS CONDUCTED BY THE PREVIOUS AND NOW DEFUNCT PROPERTY OWNER, ROANOKE IRON AND BRIDGE.
- E. CYCLE SYSTEM REPRESENTATIVES INDICATED A WILLINGNESS TO NEGOTIATE A CONSENT ORDER FOR REMOVAL ACTIONS AT THE SITE.
- F. ACCESS TO THE SITE WAS DENIED.

III. FUTURE PLANS

- A. OSC TO SEND A GENERAL NOTICE AND CERCLA 104(E) LETTER TO CYCLE SYSTEMS TO GATHER ADDITIONAL INFORMATION CONCERNING THE SITE AND PRP.

- B. OSC TO DRAFT AND ASSIST IN NEGOTIATION OF A CONSENT ORDER TO CONDUCT EXTENT OF CONTAMINATION STUDY AND EXCAVATION AND DISPOSAL OF LEAD CONTAMINATED SOIL AT THE SITE.
- C. OSC TO COORDINATE SITE ACTIVITIES WITH STATE AND LOCAL OFFICIALS.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV



POLREP #3 (REVISED - FORMALLY NO. 4)

WALNUT AVENUE LEAD SITE

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

I. SITUATION (1200 HRS, TUESDAY, NOVEMBER 22, 1994)

- A. CONSENT ORDER TO PERFORM EXTENT OF CONTAMINATION STUDY AND REMOVAL OF LEAD CONTAMINATED SOILS/MATERIALS HAS BEEN DRAFTED AND SENT TO CYCLE SYSTEMS, INC.
- B. OSC TO VISIT SITE TO VERIFY CURRENT SITE CONDITIONS IN ORDER TO FINALIZE CONSENT ORDER.
- C. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO THE WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- D. PERSONNEL ON SITE: EPA-1, CYCLE SYSTEMS-1, ERM-1

II. ACTIONS TAKEN

- A. OSC DODD MOBED TO SITE TO CONDUCT ON-SITE VISIT TO VERIFY CURRENT CONDITIONS AND TO DISCUSS PRP PROPOSED SAMPLING PLAN.
- B. THE SITE IS IN AN INDUSTRIAL/COMMERCIAL SETTING. RESIDENTIAL HOUSING IS LOCATED ACROSS THE ROANOKE RIVER FROM THE SITE, APPROXIMATELY 100 YARDS FROM THE SITE.
- C. OF THE THREE AREAS IDENTIFIED AS HAVING ELEVATED LEVELS OF LEAD, ONLY ONE AREA WAS WITHIN THE FACILITY'S PERIMETER FENCE. TWO AREAS OF CONCERN WERE BETWEEN THE FENCELINE AND THE ROANOKE RIVER. OSC DODD OBSERVED A CHAIN LINK FENCE SURROUNDING THE FACILITY, HOWEVER SEVERAL BREECHES IN THE FENCE WERE NOTED. TWO OF THE BUILDINGS ON THE SITE ARE EQUIPPED WITH BURGLAR ALARMS, MONITORED BY A LOCAL SECURITY SERVICE.
- D. IN GENERAL, THE AREA BETWEEN THE FACILITY'S FENCELINE AND THE ROANOKE RIVER APPEARS TO HAVE RECEIVED FILL. A PILE (APPROXIMATELY 10'x 10' x 3') OF FILL APPEARING TO CONTAIN PAINT PIGMENT WAS FOUND ON THE NORTHEAST CORNER OF THE SITE ADJACENT TO THE WAREHOUSE.
- E. ERM'S PROPOSED SAMPLING PLAN ONLY ADDRESSES LIMITED SAMPLING IN THE IDENTIFIED AREAS OF CONCERN.

POLREP #4

WALNUT AVENUE LEAD SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR  
EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1800 HRS, TUESDAY, MARCH 14, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO THE WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. AN ADMINISTRATIVE CONSENT ORDER WAS FINALIZED AND SIGNED ON 12/27/94 FOR THE EXTENT OF CONTAMINATION STUDY AND REMOVAL OF LEAD CONTAMINATED SOILS/MATERIALS.
- C. THE RESPONSE ACTION PLAN (RAP) WAS SIGNED ON 02/27/95. CYCLE SYSTEMS AND CONTRACTOR ENVIRONMENTAL RESOURCE MANAGEMENT (ERM) BEGAN PREPARATION FOR SAMPLING ACTIVITIES.
- D. OSC DODD AND ERM PERSONNEL WERE ON-SITE AND AGREED ON FIVE (5) SAMPLING AREAS: 1) FORMER PAINTING AREA (FPA) 2) FORMER SLAG AREA (FSA) 3) DRAINAGE DITCH AREA (DDA) 4) FORMER FOUNDRY AREA (FFA) AND 5) RIVER BANK AREA (RBA).
- E. CYCLE SYSTEMS CONTRACTORS REPAIRED EXISTING PERIMETER FENCE AND UPGRADED SECURITY MEASURES O/A 03/10/95.
- F. MEDIA INTEREST AT THE SITE IS HIGH.
- G. PERSONNEL ON SITE:
  - MONDAY, 03/13/95: TAT-1, CYCLE SYSTEMS-1, ERM-2
  - TUESDAY, 03/14/95: EPA-2, TAT-1, CYCLE SYSTEMS-1, ERM-3

II. ACTIONS TAKEN:

MONDAY, 03/13/95

- A. ERM AND TAT ARRIVED ON-SITE. ERM PERSONNEL SET UP DECON AREA WHILE CYCLE SYSTEMS LOWE GAVE TAT A SITE WALKTHROUGH.
- B. ERM COMPLETED SURFACE SAMPLING IN THE FORMER FOUNDRY AREA, THE DRAINAGE DITCH AREA, AND COMPLETED A PORTION OF THE FORMER SLAG AREA. A TOTAL OF 17 SURFACE SOIL SAMPLES, 4 PAINT RESIDUE SAMPLES AND 1 EQUIPMENT BLANK WERE COLLECTED.
- C. TAT PHOTODOCUMENTED SAMPLING AREAS AND LOGGED SAMPLE INFORMATION.
- D. ERM AIR-MONITORED WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

TUESDAY, 03/14/95

- E. AT 1030 HOURS, ERM PERSONNEL TOOK 24 SAMPLES TO A LOCAL LABORATORY FOR TOTAL LEAD AND TCLP ANALYSIS.

- THESE SAMPLES INCLUDE ALL 03/13//95 SAMPLES AND THREE (3) SAMPLES FROM 03/14/95 AM ACTIVITIES.
- F. ERM HELD A PRESS CONFERENCE ON-SITE AT 1400 HOURS TO UPDATE AREA RESIDENTS ON CURRENT ACTIVITIES. OSC DODD AND COMMUNITY RELATIONS COORDINATOR GAUGHAN WERE ON-SITE TO ANSWER QUESTIONS.
  - G. MEDIA COVERAGE INCLUDED NEWS STORIES ON ALL THREE NETWORK AFFILIATE TV STATIONS, RADIO SPOTS AND NEWSPAPER ARTICLE IN ROANOKE TIMES & WORLD-NEWS.
  - H. ERM COMPLETED SAMPLING OF FORMER SLAG AREA, FORMER PAINTING AREA, AND A PORTION OF THE RIVER BANK AREA. 13 SURFACE SAMPLES, 3 SUBSURFACE SAMPLES, 1 BLIND DUPLICATE, AND 3 PAINT RESIDUE SAMPLES WERE COLLECTED.
  - I. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO LEVELS ABOVE BACKGROUND WERE DETECTED.

### III. FUTURE PLANS

- A. ERM TO RECEIVE RESULTS OF 24 SAMPLES ON 03/15/95.
- B. ERM TO COMPLETE SAMPLING OF THE RIVER BANK AREA AND SEND 03/14/95 SAMPLES TO LOCAL LABORATORY FOR TOTAL LEAD AND TCLP ANALYSIS.
- C. OSC DODD AND ERM PERSONNEL TO REVIEW RESULTS AND DISCUSS POSSIBLE ADDITIONAL SAMPLING LOCATIONS/DEPTHS OF AREAS WHICH MAY CONTAIN LEAD LEVELS IN EXCESS OF 1000 PARTS PER MILLION (PPM).
- D. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV



POLREP #5

WALNUT AVENUE LEAD SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR  
EXTENT OF CONTAMINATION EFFORTS

- I. SITUATION (1830 HRS, WEDNESDAY, MARCH 15, 1995)
- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO THE WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
  - B. PERSONNEL ON SITE:  
EPA-1, TAT-1, CYCLE SYSTEMS-1, ERM-2
  - C. WEATHER: SUNNY WITH TEMPERATURES IN THE LOW 70'S.
  - D. NO ADDITIONAL MEDIA INTEREST AT THE SITE HAS OCCURRED.
- II. ACTIONS TAKEN:
- A. ERM COMPLETED THE COLLECTION OF SURFACE SAMPLES FROM THE RIVER BANK AREA.
  - B. LABORATORY ANALYSIS OF THE 20 SOIL SAMPLES FROM 03/13/95 AND 03/14/95 SHOWED ELEVATED LEAD LEVELS UP TO 20,000 PPM AT VARIOUS LOCATIONS IN THE DRAINAGE DITCH AREA (DDA), THE FORMER FOUNDRY AREA (FFA), AND THE FORMER SLAG AREA (FSA). ANALYSIS OF PAINT RESIDUE DETECTED ELEVATED LEAD LEVELS IN THE FFA (3820 PPM) AND IN THE FSA (UP TO 87200 PPM).
  - C. OSC DODD, TAT, CYCLE SYSTEMS LOWE, AND ERM PERSONNEL HAD A MEETING TO DISCUSS ADDITIONAL SAMPLING IN AREAS WHERE LEAD IN SOIL CONCENTRATIONS EXCEEDED 1000 PPM. ERM'S PROJECT MANAGER BENNETT AND OSC AGREED ON ADDITIONAL SURFACE AND DEPTH SOIL SAMPLING AT THE DDA AND THE FSA. ERM TOLD OSC THAT ONLY ADDITIONAL LATERAL SURFICIAL SAMPLING WILL TAKE PLACE AT THE FFA. ERM IS ASSUMING THAT THE ENTIRE SOIL/DEBRIS PILE IS OVER 1000 PPM AND WILL HAVE TO BE REMOVED.
  - D. OSC NOTICED A WHITE FIBER-LIKE SUBSTANCE MIXED IN WITH FOUNDRY BRICKS AT THE FFA. OSC TOLD ERM THAT UNTIL A SAMPLE OF THE MATERIAL CAN BE ANALYZED FOR ASBESTOS, ALL SAMPLING IN THE FFA SHOULD TAKE PLACE IN LEVEL C.
  - E. ERM PERSONNEL DELIVERED 15 SOIL SAMPLES AND THREE (3) PAINT RESIDUE SAMPLES TO A LOCAL LABORATORY FOR TCLP AND TOTAL LEAD ANALYSIS.
  - F. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE PLANS

- A. ERM TO RECEIVE RESULTS OF 18 SAMPLES ON 03/16/95.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS.
- C. OSC TO SPEAK WITH ERM REGARDING SAMPLING OF ASBESTOS-LIKE SUBSTANCE.
- D. OSC TO SPEAK WITH ERM PERSONNEL REGARDING CHANGING THE HEALTH AND SAFETY ACTION PROTECTION LEVEL FOR LEAD NOW THAT THE LEVELS EXCEED 5200 PPM.
- E. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- F. ERM TO CONTINUE AIR-MONITORING AND SAMPLE COLLECTION ACTIVITIES.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

POLREP #6

WALNUT AVENUE LEAD SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR  
EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1900 HRS, THURSDAY, MARCH 16, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO THE WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON SITE:  
EPA-1, TAT-1, CYCLE SYSTEMS-1, ERM-2
- C. WEATHER: SUNNY WITH TEMPERATURES IN THE MID 70'S.
- D. DUE TO THE INCREASED LEAD LEVELS, THE ACTION LEVEL FOR LEAD WITH THE RAM HAS BEEN CHANGED TO 1.0 mg/m3.

II. ACTIONS TAKEN:

- A. ERM COMPLETED THE COLLECTION OF ADDITIONAL SURFICIAL AND SUBSURFACE SOIL SAMPLES AT THE DRAINAGE DITCH AREA (DDA) AND COMPLETED ADDITIONAL SURFICIAL SAMPLING AT THE FORMER SLAG AREA (FSA).
- B. ERM COMPLETED COLLECTION OF THREE (3) ADDITIONAL SURFACE SOIL SAMPLES AND THREE (3) POTENTIAL ASBESTOS CONTAINING MATERIAL (ACM) SAMPLES AT THE FORMER FOUNDRY AREA (FFA). ALL SAMPLING ACTIVITIES IN THE FFA WERE DONE IN LEVEL C.
- C. OSC, TAT AND CYCLE SYSTEMS LOWE TOOK A SITE WALK THROUGH OF THE FACILITY. A BRIGHT ORANGE SLAG MATERIAL WAS FOUND IN THE FPA AND THE SW AREA OF THE SITE. OSC SPOKE WITH ERM PERSONNEL AND IT WAS AGREED THAT A SAMPLE OF THE ORANGE SLAG MATERIAL WILL BE ANALYZED FOR TOTAL LEAD.
- D. ANALYTICAL RESULTS OF THE SOIL IN THE FPA AND FSA INDICATED LEAD LEVELS EXCEEDING 1000 PPM. RESULTS OF THE PAINT RESIDUE IN THE FSA EXCEEDED LEAD LEVELS OF 99000 PPM.
- E. ERM PERSONNEL DELIVERED 5 SOIL SAMPLES FROM THE RBA TO A LOCAL LABORATORY FOR TCLP AND TOTAL LEAD ANALYSIS.
- F. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE PLANS

- A. ERM TO RECEIVE ANALYTICAL RESULTS OF THE 5 RBA SAMPLES ON 03/17/95 AND TO SEND 03/16/95 SOIL SAMPLES TO THE LOCAL LABORATORY FOR LEAD AND TCLP ANALYSIS.



- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS.
- C. OSC AND ERM PROJECT MANAGER BENNETT TO HAVE A MEETING CONCERNING ADDITIONAL SAMPLING AREAS ON 03/17/95.
- D. ERM TO SET UP LABORATORY FOR THE ANALYSIS OF THE POTENTIAL ACM SAMPLES.
- E. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- F. ERM TO CONTINUE AIR-MONITORING AND SAMPLE COLLECTION ACTIVITIES.

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JEFF DODD, OSC  
US EPA REGION III  
WHEELING, WV

Inc #007  
 Walnut Ave Lead Site  
 Walnut Ave. SE  
 Amelia, VA

ORIGINAL  
 (Red)

n: Karen Melvin, Dean's Corney, + KRC

Situation (As of 1500 hours, Thursday, December 11, 1997)

- a. Continue Monitoring PRP compliance with the AOC.
- b. Personnel on site: Sata
- c. Weather: Cold and overcast with occasional rain.

#### Actions Taken

- A. FSA/FPA drum storage area confirmation samples below 1000 mg/kg RRG for lead.
- B. Excavation of FSA/FPA former stockpile area. Initial confirmation samples revealed lead levels above the RRG. Further excavation continued and are awaiting second confirmation sample results.
- C. "Overs" pile free of paint and fine materials, cleared by SAT + OSC to be used as backfill in FSA/FPA.
- D. 58 truckloads, to a total of 257 truckloads to date, have been transported to USA waste, Amelia, VA for disposal. 290 ~ 295
- E. Six post treatment samples collected to verify effectiveness of treatment process prior to transport to USA waste. All results were negative, below 5 ppm lead.
- F. Sata along with Huggins and Draper + Adam conduct final site walk through to document completion of AOC.
- G. Sata departs from site, 1500 hours, Thursday, December 11, 1997.

#### II. Future Actions

- A. Continue perimeter + personnel air monitoring as necessary.
- B. Continue excavation and confirmation sampling in FSA/FPA former stockpile area.
- C. Continue treatment of contaminated soils and post treatment analysis.
- D. Continue transportation of treated material to USA waste, Amelia, VA.
- E. Cycle Systems to forward to Sata all future confirmation sample results and completion reports.

Wilson Water  
 204967 { 3.7 ppm Lead  
 PTX

Ikal Jhabark  
 U.S. EPA Region III  
 Phila, PA

To: Mital Shabazz, OSC

Phone: 1215 566 3281

ax: 1215 566 3254

RE: Walnut Avenue Lead Site, Pol rep # 007

from: Stephen Porter, SATA

Phone: 1540 981 1216

ax: 1540 981 1084



to: Mikal Shabazz, OSC

RE: Walnut Ave Lead Site Idrep #006

ORIGINAL  
(Red)

Phone: 215 566 3281

fax: 215 566 3254

From: Stephen Porter, SATA

Phone: 540 981 1216

Fax: 540 981 1084

ORIGINAL  
(Red)

Ref: #1006

Walnut Ave. Lead Site

238 Walnut Ave, SE

Roanoke, VA

Attn: Karen McLean, Dennis Curran + RRC

I. Situation (As of 0900 Hours, ~~Wednesday~~ Friday, December 5, 1997)

- a. Continue monitoring PEP compliance with the AOC.
- b. Personnel on site: 1 SA
- c. weather: Cold with temps in upper 30s to low 40s and relatively clear
- d. Project delayed because of extensive removal in FSA/FPA drum storage area

## II. Actions Taken

- A. Trucks deliver soil to be used as backfill in "clean areas"
  - B. FSA/FPA drum storage area excavated. Air w. 6K contamination removed. Awaiting confirmation sample results.
  - C. FSA/FPA truck back segment confirmation samples revealed lead levels below 1000 mg/kg Pb. Area back filled with clean soil.
  - D. 67 truckloads, to a total of 129 truck loads of waste, have been transported to old waste, Amalg, VA for disposal.
  - E. Twelve post treatment samples collected to verify effectiveness of treatment process prior to transport to old waste for disposal.
- All results were negative, below 5ppm lead.

## III. Future Actions

- A. Continue perimeter & personnel air monitoring as necessary.
- B. Continue excavation and confirmation sampling in FSA/FPA former storage area.
- C. Continue treatment of contaminated soils and post treatment analysis.
- D. Continue transportation of treated materials to old waste, Amalg

POLREP 7

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ORD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1830 HOURS FRIDAY, MARCH 17, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
EPA - 1, TAT -1, CYCLE SYSTEMS - 1, ERM - 4
- C. WEATHER: SUNNY WITH TEMPERATURES IN THE LOW 70'S.
- D. OSC WAS CONTACTED BY A LOCAL RADIO STATION REGARDING ANALYTICAL RESULTS FROM THE SAMPLING EFFORT. OSC TOLD THE RADIO STATION REPRESENTATIVE THAT RESULTS WERE DETECTED UP TO 20000 PPM AND SAMPLING GRID IS CURRENTLY BEING EXTENDED.

II. ACTIONS TAKEN:

- A. ERM COLLECTED 11 SURFICIAL AND SUBSURFACE SOIL SAMPLES FROM THE FORMER SLAG AREA (FSA) AND ONE (1) 3-POINT COMPOSITE OF THE FOUNDRY SLAG FROM THE SW AREA OF SITE.
- B. ANALYTICAL RESULTS OF THE RIVER BANK AREA (RBA) INDICATED LEAD LEVELS IN EXCESS OF 3600 PPM. ADDITIONAL SAMPLING WILL TAKE PLACE IN THIS AREA.
- C. ERM'S BRANCH MANAGER HUGGINS WAS ON-SITE TO VIEW FOUNDRY SLAG AREAS.
- D. ERM DELIVERED 25 SOIL SAMPLES, 1 FOUNDRY SLAG SAMPLE AND 3 POTENTIAL ASBESTOS SAMPLES FROM 03/16/95 -03/17/95 SAMPLING TO THE LOCAL LABORATORY FOR TOTAL LEAD AND TCLP ANALYSIS, AND ASBESTOS ANALYSIS.
- E. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/17/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ERM'S CONTRACTORS TO BE ON-SITE MONDAY, 03/20/95 TO BEGIN SURVEYING OF SAMPLE LOCATIONS.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

12/11/1997  
 10 Walnut Ave. SE  
 Atlanta, VA

Mr. Karen Meun, Dean's Gentry, +REC

Station (As of 1500 hours, Thursday, December 11, 1997)

1. Continue Monitoring PEP (continue with the AOC.
2. Personal on-site: Sato
3. Weather: (cold and overcast with occasional rain.

### ACTIONS TAKEN

1. BSA/PPA drum storage area confirmation samples below 1000 mg/lpg REC for lead.
2. Excavation of BSA/PPA former stockpile area. Initial confirmation samples revealed lead levels above the REC. Further excavation continued and are awaiting second confirmation sample results.
3. "Overs" pile free of paint and fine material, cleared by SATT + OSC to be used as backfill in BSA/PPA.
4. 58 truck loads, to a total of 257 truckloads to date, have been transported to USA waste.
5. BSA/PPA for disposal.

6. SATT post treatment samples collected to verify effectiveness of treatment process prior to transport to USA waste. All results were negative, below 5 ppm lead.

7. Sato along with Higgins and Draper/Adam conducted final site walk through to document completion of AOC.

8. Sato samples from site, 1500 hours, Thursday, December 11, 1997.

### II. Future Actions

1. Continue generator + personnel monitoring as necessary.
2. (Continue excavation and confirmation sampling in BSA/PPA former stockpile area.
3. (Continue treatment of contaminated soils and post treatment analysis.
4. (Continue transportation of treated material to USA waste, Annelia, VA.
5. Cycle Systems to forward to Sato all future confirmation sample results and completion reports.

1. S. EPA Region III  
 1. S. EPA Region III  
 1. S. EPA Region III



Mikal Shobart, OSC

NO: 1215 566 3281

: 1215 566 3254

E: Walnut Avenue Road Site, Pump # 007

SM: Stephen Zoller, SAT4

ONE: 1540 981 1216

.X: 1540 981 1084

Original  
(Red)

POLREP 8

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

- I. SITUATION (1800 HOURS MONDAY, MARCH 20, 1995)
  - A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
  - B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 3,  
KOONTZ BRYANT -2
  - C. WEATHER: OVERCAST WITH TEMPERATURES IN MID 60'S.
  - D. NO FURTHER MEDIA COVERAGE HAS BEEN GENERATED.
- II. ACTIONS TAKEN:
  - A. ERM COLLECTED 2 ADDITIONAL SUBSURFACE SOIL SAMPLES AT THE FORMER SLAG AREA (FSA) AND 2 ADDITIONAL NODULES SAMPLES OF THE FOUNDRY SLAG AT THE EQUIPMENT STORAGE AREA (ESA).
  - B. ERM RECEIVED ANALYTICAL RESULTS INDICATING ADDITIONAL ELEVATED LEAD LEVELS IN EXCESS OF 32000 PPM IN THE FSA, 1500 PPM IN THE DRAINAGE DITCH AREA (DDA), 11000 IN THE FORMER FOUNDRY AREA (FFA), AND 38000 PPM IN THE ESA.
  - C. ERM DELIVERED 11 SOIL AND NODULE SAMPLES TO A LOCAL LABORATORY FOR TOTAL LEAD AND TCLP ANALYSIS.
  - D. ERM'S BRANCH MANAGER HUGGINS ON SITE TO DISCUSS ADDITIONAL SAMPLING WITH CYCLE SYSTEM'S LOWE.
  - E. KOONTZ BRYANT REPRESENTATIVES BEGAN SURVEYING SAMPLE LOCATIONS.
  - F. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.
- III. FUTURE ACTIONS
  - A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/17/95 AND 03/20/95 SAMPLING.
  - B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
  - C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
  - D. OSC DODD REQUESTED UPDATED MAPS OF SAMPLE LOCATIONS.
  - E. ERM TO CONTINUE AIR-MONITORING.
  - F. KOONTZ BRYANT TO CONTINUE SURVEYING OF SAMPLE LOCATIONS.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

POLREP 9

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

138 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1900 HOURS TUESDAY, MARCH 21, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:
  - TAT -1, CYCLE SYSTEMS - 1, ERM - 2,
  - KOONTZ BRYANT -2
- C. WEATHER: WINDY WITH TEMPERATURES IN HIGH 50'S.
- D. NO FURTHER MEDIA COVERAGE HAS BEEN GENERATED.

II. ACTIONS TAKEN:

- A. ERM PERSONNEL, CYCLE SYSTEMS LOWE, AND TAT HAD A CONFERENCE CALL WITH OSC DODD TO DISCUSS ADDITIONAL SAMPLING LOCATIONS. ERM FAXED A REVISED MAP OF THE FORMER SLAG AREA (FSA) TO OSC DODD.
- B. ERM COLLECTED 3 ADDITIONAL SOIL SAMPLES AT THE DRAINAGE DITCH AREA (DDA). NO SAMPLE WAS COLLECTED UPGRADIENT OF DDA-6 DUE TO THE PRESENCE OF CEMENT. SIX (6) ADDITIONAL SOIL SAMPLES WERE COLLECTED AT THE FSA.
- C. ERM RECEIVED ANALYTICAL RESULTS INDICATING LEAD LEVELS UP TO 103000 PPM OF THE FOUNDRY NODULES IN THE EQUIPMENT STORAGE AREA (ESA) AND LEAD LEVELS IN EXCESS OF 24000 PPM IN THE FSA.
- D. ANALYTICAL RESULTS FOR ASBESTOS WERE FOUND TO BE NEGATIVE IN THE FORMER FOUNDRY AREA (FFA).
- E. ERM DELIVERED 10 SOIL SAMPLES AND 1 EQUIPMENT BLANK TO THE LOCAL LABORATORY FOR TOTAL LEAD AND TCLP ANALYSIS.
- F. KOONTZ BRYANT REPRESENTATIVES COMPLETED SURVEYING SAMPLE LOCATIONS AND BUILDINGS.
- G. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/20/95 AND 03/21/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.

- D. OSC TO CONTINUE DAILY CONFERENCE CALL WITH ERM PERSONNEL TO DISCUSS ADDITIONAL PROPOSED SAMPLING LOCATIONS.
- E. ERM TO CONTINUE AIR-MONITORING.
- F. CYCLE SYSTEMS LOWE TO SPEAK WITH ROANOKE'S WATER POLLUTION REPRESENTATIVE REGARDING THE DISCHARGE OF DECONTAMINATED WATER INTO A STORM DRAIN THAT LEADS INTO THE ROANOKE RIVER.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV



POLREP 10

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (2030 HOURS WEDNESDAY, MARCH 22, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2,
- C. WEATHER: WINDY WITH TEMPERATURES IN HIGH 60'S.
- D. NO FURTHER MEDIA COVERAGE HAS BEEN GENERATED.

II. ACTIONS TAKEN:

- A. A CONFERENCE CALL WAS HELD BETWEEN OSC, ERM PERSONNEL, CYCLE SYSTEMS LOWE, AND TAT. OSC WAS UPDATED ON PROPOSED SAMPLING AND AGREED TO ADDITIONAL SAMPLING LOCATIONS. ERM'S PROJECT MANAGER BENNETT CONCEDED TO OSC THAT THE ONE ADDITIONAL SURFACE SAMPLE TO THE LEFT OF THE DOOR IN THE FORMER FOUNDRY AREA (FFA) WILL CONTAIN ELEVATED LEAD LEVELS DUE TO THE PRESENCE OF PAINT FRAGMENTS. A DEPTH SAMPLE WILL BE TAKEN AT THAT LOCATION IN LIEU OF THE SURFACE SAMPLE, HOWEVER A SURFACE SAMPLE WILL BE TAKEN TO THE RIGHT OF THE DOOR IN THE FFA.
- B. ERM COLLECTED 6 ADDITIONAL SOIL SAMPLES AT THE FFA. AN ADDITIONAL SAMPLE WAS COLLECTED BECAUSE FFA-2 WAS NOT DOWNGRADE OF FFA-5. ERM ALSO COLLECTED 5 ADDITIONAL SAMPLES AT THE EQUIPMENT STORAGE AREA (ESA) AND 3 SAMPLES IN THE FORMER PAINTING AREA (FPA).
- C. ERM RECEIVED ANALYTICAL RESULTS FROM 03/20/95 -03/21/95. SURFACE LEAD LEVELS WERE FOUND IN EXCESS OF 5800 PPM IN THE FSA. A LEAD LEVEL OF 109000 PPM WAS DETECTED FOR A BOLT FOUND IN THE ESA. RESULTS OF SOIL SAMPLES IN THE DRAINAGE DITCH AREA (DDA) WERE BELOW THE ACTION LEVEL.
- D. ETS LABORATORIES WERE ON-SITE TO PICK UP 6 SOIL SAMPLES FROM THE FFA. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- E. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/22/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.

- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. OSC TO CONTINUE DAILY CONFERENCE CALL WITH ERM PERSONNEL TO DISCUSS ADDITIONAL PROPOSED SAMPLING LOCATIONS.
- E. ERM TO CONTINUE AIR-MONITORING.
- F. CYCLE SYSTEMS LOWE TO SPEAK WITH ROANOKE'S WATER POLLUTION REPRESENTATIVE REGARDING THE DISCHARGE OF THE DECONTAMINATED WATER INTO A STORM DRAIN THAT LEADS INTO THE ROANOKE RIVER.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

LREP 11

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

8 WALNUT AVENUE

MANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

CONTENT OF CONTAMINATION EFFORTS

SITUATION (1900 HOURS THURSDAY, MARCH 23, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2,
- C. WEATHER: CLOUDY WITH TEMPERATURES IN LOW 60'S.

I. ACTIONS TAKEN:

- A. ERM CONTINUED WITH ADDITIONAL LATERAL AND DEPTH SAMPLING. 12 SOIL SAMPLES WERE COLLECTED FROM THE EQUIPMENT STORAGE AREA (ESA), FORMER FOUNDRY AREA (FFA), FORMER PAINTING AREA (FPA) AND FORMER SLAG AREA (FSA).
- B. ERM RECEIVED ANALYTICAL RESULTS FROM 03/22/95 SAMPLING. SURFICIAL LEAD LEVELS WERE FOUND IN EXCESS OF 15000 PPM AND SUBSURFACE LEVELS OVER 5000 PPM WERE DETECTED IN THE FFA.
- D. ETS LABORATORIES WERE ON-SITE TO PICK UP 12 SOIL SAMPLES FROM THE ESA AND FPA. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- E. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.
- F. CYCLE SYSTEMS PRESIDENT BRUCE BRENNER WAS ON-SITE TO SPEAK WITH CYCLE SYSTEM'S LOWE REGARDING CURRENT SAMPLING ACTIVITIES.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/23/95 SAMPLING.
- B. ERM TO SEND 03/23/95 SAMPLES AT 0800 HOURS, FRIDAY, 03/24/95.
- C. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- D. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- E. OSC TO CONTINUE DAILY CONFERENCE CALL WITH ERM PERSONNEL TO DISCUSS ADDITIONAL PROPOSED SAMPLING LOCATIONS.
- F. ERM TO CONTINUE AIR-MONITORING.

- G. CYCLE SYSTEMS LOWE TO SPEAK WITH ROANOKE'S WATER POLLUTION REPRESENTATIVE REGARDING THE DISCHARGE OF THE DECONTAMINATED WATER INTO A STORM DRAIN THAT LEADS INTO THE ROANOKE RIVER.

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EFF DODD, OSC  
.S. EPA REGION III  
HEELING, WV



OLREP 12

ALNUT AVENUE SITE (ENFORCEMENT LEAD)

38 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1900 HOURS FRIDAY, MARCH 24, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 4,
- C. WEATHER: COOL WITH TEMPERATURES IN LOW 60'S.

II. ACTIONS TAKEN:

- A. ERM CONTINUED WITH ADDITIONAL LATERAL AND DEPTH SAMPLING IN ESA, RBA, FPA AND FSA. 14 SOIL SAMPLES WERE COLLECTED FOR TOTAL LEAD AND TCLP ANALYSIS. ONE (1) SAMPLE OF PAINT CHIPS WAS ALSO COLLECTED FOR TCLP.
- B. ERM RECEIVED WORD FROM ETS LABORATORIES THAT THE 03/23/95 SAMPLES FAILED FINAL QA/QC. PRELIMINARY DRY-WEIGHT RESULTS WERE FAXED AND ERM SHOULD RECEIVE FINAL DRY-WEIGHT RESULTS ON MONDAY, 03/27/95 .
- C. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP 16 SAMPLES FROM 03/23/95 - 03/24/95. 6 SAMPLES WERE ALSO DELIVERED TO ETS LABORATORIES BY ERM LATER IN THE DAY. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- D. ERM'S BRANCH MANAGER HUGGINS AND ENGINEER KRYE WERE ONSITE TO VIEW ESA. ERM'S KRYE TOLD ERM'S HUGGINS THAT THE ORANGE MATERIAL IN THE ESA IS NOT FOUNDRY SAND.
- E. ROANOKE'S CITY WATER POLLUTION CONTROL REPRESENTATIVE SENSABOUGH WAS ONSITE TO DESIGNATE A SANITARY SEWER FOR THE DISPOSAL OF THE DECONTAMINATED WATER. REF. SENSABOUGH WAS UNABLE TO LOCATE A DEFINITE SANITARY SEWER, THEREFORE NO DECON WATER WAS DISPOSED OF.
- F. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE FINAL LABORATORY RESULTS FROM 03/24/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.

- D. OSC TO CONTINUE DAILY CONFERENCE CALL WITH ERM PERSONNEL TO DISCUSS ADDITIONAL PROPOSED SAMPLING LOCATIONS.
- E. ERM TO CONTINUE AIR-MONITORING.
- F. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.
- G. ERM TO PICK UP A POWER AUGER ON MONDAY, 03/27/95 TO AID IN SUBSURFACE SAMPLING.

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JEFF DODD, OSC  
J.S. EPA REGION III  
WHEELING, WV

POLREP 13

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR EXTENT OF  
CONTAMINATION EFFORTS

I. SITUATION (1900 HOURS MONDAY, MARCH 27, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: OVERCAST WITH TEMPERATURES IN MID 50'S.

II. ACTIONS TAKEN:

- A. ERM CONTINUED WITH ADDITIONAL LATERAL AND DEPTH SAMPLING. FOUR (4) SURFICIAL AND SUBSURFACE SOIL SAMPLES WERE COLLECTED AT THE FSA AND TWO (2) DEPTH SOIL SAMPLES WERE COLLECTED AT THE ESA.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP THE 6 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. A POWER AUGER WAS RENTED TO AID IN SUBSURFACE SAMPLING. ALL SAMPLING ACTIVITIES WITH THE AUGER TOOK PLACE IN LEVEL C. NO READINGS ABOVE BACKGROUND WERE DETECTED.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/24/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 4,000 PPM IN THE ESA, 7,000 IN THE FPA, 5,000 PPM IN THE FFA, AND 4,000 IN THE RBA.
- E. ERM CONTINUED AIR-MONITORING WITH A MICROTIP AND RAM. NO READINGS ABOVE BACKGROUND WERE DETECTED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/27/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.

F. CYCLE SYSTEM'S PERSONNEL TO COME ON-SITE, TUESDAY,  
03/28/95 WITH FORK-LIFT TO PICK UP FOUR (4) BOXES AND  
TRANSFER THEM TO THEIR OTHER FACILITY. ALL ACTIVITIES  
WILL TAKE PLACE IN THE SAFETY ZONE.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV



POLREP 14

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR EXTENT OF  
CONTAMINATION EFFORTS

I. SITUATION (1900 HOURS TUESDAY, MARCH 28, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: WINDY WITH TEMPERATURES IN MID 50'S.

II. ACTIONS TAKEN:

- A. ERM CONTINUED WITH ADDITIONAL LATERAL AND DEPTH SAMPLING. FOUR (4) SURFICIAL AND TWO (2) SUBSURFACE SAMPLES WERE COLLECTED AT THE FFA. TWO (2) SURFICIAL AND TWO (2) SUBSURFACE SAMPLES WERE ALSO COLLECTED AT THE FPA.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP THE 6 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ALL SAMPLING ACTIVITIES WITH THE POWER AUGER TOOK PLACE IN LEVEL C. NO READINGS ABOVE BACKGROUND WERE DETECTED.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/27/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 7000 PPM IN THE FPA. FSA LEVELS, HOWEVER WERE FOUND BE BELOW 108 PPM.
- E. CYCLE SYSTEMS PERSONNEL WERE ONSITE TO REMOVE STORAGE AND TRANSFER THEM TO ANOTHER FACILITY. WORKERS REMAINED IN THE SAFETY ZONE AT ALL TIMES.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE EXCESS LABORATORY RESULTS FROM 03/27/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.

F. KOONTZ BRYANT SURVEYORS TO MOBE BACK ON-SITE ON  
WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE  
LOCATIONS.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

LREP 16

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

8 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

CONTENT OF CONTAMINATION EFFORTS

SITUATION (1930 HOURS THURSDAY, MARCH 30, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: WINDY WITH TEMPERATURES IN MID 50'S.
- D. NO FURTHER MEDIA COVERAGE HAS BEEN GENERATED.

II. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 4 SURFICIAL SAMPLES AND 1 DEPTH SAMPLE WERE COLLECTED FROM THE FSA.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP THE 8 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. NO-CUTS WAS ON-SITE TO MARK ELECTRICAL LINES. THE LINE RUNS FROM THE LEFT OF THE STAIRS AT THE OFFICE BUILDING TO THE TELEPHONE POLE IN FRONT OF THE AST ACROSS THE DRIVEWAY.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/29/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 2000 PPM IN THE FFA, 7000 PPM IN THE FPA, AND LEVELS UP TO 6000 PPM IN THE FFA.
- E. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/30/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.

- F. KOONTZ BRYANT SURVEYORS TO MOBE BACK TO SITE ON WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE LOCATIONS.
- G. ETS LABORATORY REPRESENTATIVE TO PICK UP 5 SOIL SAMPLES ON FRIDAY, 03/31/95.
- H. PRP AND IT'S CONTRACTOR TO HOLD MEETING ON FRIDAY, 03/31/95 TO DISCUSS REMEDIATION ALTERNATIVES.

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FF DODD, OSC  
S. EPA REGION III  
EELING, WV



POLREP 15

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERREXTENT OF  
CONTAMINATION EFFORTS

I. SITUATION (1930 HOURS WEDNESDAY, MARCH 29, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: CLOUDY WITH TEMPERATURES IN MID 50'S.
- D. NO FURTHER MEDIA COVERAGE HAS BEEN GENERATED.

II. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 4 SURFICIAL SAMPLES WERE COLLECTED FROM THE FSA, 3 SURFICIAL SAMPLES WERE COLLECTED FROM THE FPA, AND 10 SURFICIAL AND 1 SUBSURFACE SAMPLE WERE COLLECTED FROM THE FFA.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICKUP THE 9 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ERM RETURNED THE POWER AUGER FROM AZTEC RENTAL COMPANY AND RENTED A LONGER POWER AUGER FROM RENT-ALL RENTAL COMPANY.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/28/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 8000 PPM IN THE FPA, 4500 PPM IN THE FSA, AND 7000 PPM IN THE FFA. ESA LEVELS HOWEVER, WERE FOUND TO BE BELOW 12 PPM.
- E. APPALACHIAN POWER COMPANY (APCO) REPRESENTATIVE WAS ONSITE TO READ THE ELECTRICAL METER.
- F. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.
- G. DUE TO THE DEPTHS AT WHICH ERM MAY HAVE TO COLLECT SOIL SAMPLES, CYCLE SYSTEM'S LOWE CONTACTED M-I-S U-T-I-L-I-T-Y, A UTILITY LOCATING COMPANY OF VIRGINIA. THEY HAVE UNTIL MONDAY, 04/03/95 TO MARK THE LINES IN THE OFFICE BUILDING AREA AND THE FPA. OSC DODD IS REQUIRING THAT THE UTILITIES BE MARKED FOR THE FACILITY BEFORE THE POWER AUGER IS USED.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/29/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND

- LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
  - E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.
  - F. KOONTZ BRYANT SURVEYORS TO MOBE BACK TO SITE ON WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE LOCATIONS.
  - G. ETS LABORATORY REPRESENTATIVE TO PICK-UP 9 SOIL SAMPLES AT 0800, THURSDAY, 03/30/95.
  - H. ERM'S PROJECT MANAGER BENNETT TO COME TO SITE THURSDAY, 03/30/95.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

POLREP 17

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1700 HOURS FRIDAY, MARCH 31, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1; ERM - 3
- C. WEATHER: WINDY WITH TEMPERATURES IN MID 60'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES ARE DISPUTED.

II. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 4 SOIL SAMPLES, 1 PAINT SAMPLE, AND 1 EQUIPMENT BLANK WAS COLLECTED FROM THE FSA.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP THE 6 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ERM'S PROJECT MANAGER BENNETT ONSITE TO VIEW ADDITIONAL SAMPLING AREAS.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/31/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 2210 PPM IN THE FFA AND 3750 PPM IN THE FPA.
- E. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.
- F. ERM PLACED BARRIER FENCE AT WESTERN BOUNDARY OF FFA IN PREPARATION FOR CYCLE SYSTEMS CUSTOMER VIEWING OF LOCOMOTIVE PORT. ALL ACTIVITIES WILL TAKE PLACE IN THE SAFETY ZONE.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 03/31/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.

- F. KOONTZ BRYANT SURVEYORS TO MOBE BACK TO SITE ON WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE LOCATIONS.
- G. CYCLE SYSTEMS CUSTOMER TO VISIT SITE TO VIEW LOCOMOTIVE PORT.
- H. ERM TO LOCATE PROPERTY LINES IN FFA.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV



POLREP 18

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1930 HOURS MONDAY, APRIL 3, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: WINDY WITH TEMPERATURES IN MID 60'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES HAVE BEEN IDENTIFIED AND DELINEATED.

II. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 1 DEPTH SAMPLE AT FPA, 1 DEPTH SAMPLE AT FSA, 1 DEPTH SAMPLE AT RIVER BANK AREA (RBA) AND 1 EQUIPMENT BLANK WAS COLLECTED FROM THE RBA AREAS.
- B. A REPRESENTATIVE FROM ETS LABORATORIES WAS ONSITE TO PICK UP THE 6 SAMPLES. THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. TAT, CYCLE SYSTEMS AND ERM REPS. ADD 6 MORE SAMPLE LOCATIONS IN THE FPA TO DELINEATE THE EXTENT OF CONTAMINATION IN THE FPA AREA.
- D. ANALYTICAL RESULTS WERE RECEIVED FROM 03/31/95 SAMPLING. LEAD LEVELS WERE DETECTED IN EXCESS OF 13,800 PPM IN THE FSA.
- E. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 04/03/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.



- F. KOONTZ BRYANT SURVEYORS TO MOBE BACK TO SITE ON  
WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE  
LOCATIONS.
- G. CYCLE SYSTEMS CUSTOMER TO VISIT SITE TO VIEW LOCOMOTIVE  
PARTS.
- H. ERM TO LOCATE PROPERTY LINES IN FFA.

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JEFF DODD, OSC  
J.S. EPA REGION III  
WHEELING, WV

REP 19

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

WALNUT AVENUE  
ROANOKE, VIRGINIA

IN CHARGE: DENNIS CARNEY, KAREN MELVIN, ERD/OERR  
OBJECTIVE: MONITORING AND REMEDIATION EFFORTS

SITUATION (1800 HOURS TUESDAY, APRIL 4, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2
- C. WEATHER: WINDY WITH TEMPERATURES IN MID 50'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES ARE DISPUTED.

ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 3 DEPTH AND 3 SURFACE SAMPLES AT FSA, 2 DEPTH SAMPLES AT FPA, AND 1 EQUIPMENT BLANK WAS COLLECTED FROM THE FSA AREAS.
- B. ERM DROPPED OFF 9 SAMPLES AT ETS LABORATORIES, THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ANALYTICAL RESULTS WERE RECEIVED FROM 04/03/95 SAMPLING. SURFACE LEAD LEVELS WERE DETECTED IN EXCESS OF 15,100 PPM IN THE FPA, WHILE DEPTH SAMPLES TAKEN IN THE FPA WERE ALL LESS THEN 1000 PPM.
- D. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.

FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 04/04/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING IF NECESSARY AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.
- F. KOONTZ BRYANT SURVEYORS TO MOBE BACK TO SITE ON WEDNESDAY, 04/05/95 TO COMPLETE SURVEYING OF SAMPLE LOCATIONS.

- G. CYCLE SYSTEMS CUSTOMER TO VISIT SITE TO VIEW LOCOMOTIVE PARTS.
- H. ERM TO LOCATE PROPERTY LINES IN FFA.
- I. ERM TO BEGIN BACKFILLING SAMPLE HOLES WITH BENTONITE.
- J. SITE DEMOBE ON 04/05/95, UNTIL FURTHER ACTIONS.

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EFF DODD, OSC  
S. EPA REGION III  
HEELING, WV

POLREP 20

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

SITUATION (1930 HOURS WEDNESDAY, APRIL 5, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2, KOONTZ BRYANT - 2
- C. WEATHER: CLEAR WITH TEMPERATURES IN MID 50'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES ARE DISPUTED.

I. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 1 DEPTH AND 1 SURFACE SAMPLES AT FPA, AND 1 EQUIPMENT BLANK WAS COLLECTED FROM THE FPA.
- B. ERM DROPPED OFF 3 SAMPLES AT ETS LABORATORIES, THEY ARE TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ANALYTICAL RESULTS WERE RECEIVED FROM 04/04/95 SAMPLING. SURFACE LEAD LEVELS WERE DETECTED IN EXCESS OF 1,130 PPM IN THE FPA, WHILE DEPTH SAMPLES TAKEN IN THE FPA WERE ALL LESS THEN 1000 PPM. DEPTH SAMPLES TAKEN IN THE RBA EXCEEDED 2,060 PPM.
- D. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.
- E. KOONTZ BRYANT SURVEYORS ONSITE TO FINISH SURVEYING REMAINING SITE SAMPLE LOCATIONS.
- F. ERM BACKFILLED ALL SITE SAMPLING HOLES WITH BENTONITE.

I. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 04/05/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING IF NECESSARY AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.

- F. CYCLE SYSTEMS CUSTOMER TO VISIT SITE TO VIEW LOCOMOTIVE PARTS.
- G. ERM TO LOCATE PROPERTY LINES IN FFA.
- H. SITE DEMOBE ON 04/06/95, PENDING 04/05/95 ANALYTICAL RESULTS.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV



ALREP 21

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

8 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

SITUATION (1830 HOURS THURSDAY, APRIL 6, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2,
- C. WEATHER: CLEAR WITH TEMPERATURES IN THE UPPER 60'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES ARE DISPUTED.

I. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 1 DEPTH SAMPLE TAKEN IN FSA TO DELINEATE EXTENT OF CONTAMINATION.
- B. ERM DROPPED OFF 1 SAMPLE AT ETS LABORATORIES, IT IS TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ANALYTICAL RESULTS WERE RECEIVED FROM 04/05/95 SAMPLING. DEPTH SAMPLE LEAD LEVELS IN THE FSA WERE DETECTED UP TO 1,130 PPM.
- D. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.
- E. ERM REPAIRED FALLEN FENCE ALONG THE FFA BOUNDARY.
- F. CYCLE SYSTEMS CUSTOMER ONSITE TO VIEW LOCOMOTIVE PARTS.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 04/05-06/95 SAMPLING.
- B. ERM TO CONTINUE ADDITIONAL SAMPLING IF NECESSARY AT SPECIFIED LOCATIONS, AS DEFINED BY ANALYTICAL RESULTS.
- C. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- D. ERM TO CONTINUE AIR-MONITORING.
- E. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.
- F. ERM TO LOCATE PROPERTY LINES IN FFA.
- G. SITE DEMOBE ON 04/07/95, PENDING RESULTS OF LATEST SAMPLE RESULTS.
- H. KOONTZ BRYANT SURVEYORS ONSITE WEEK OF 04/14/95, TO LOCATE SITE PROPERTY BOUNDARIES IN FFA AREA.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

POLREP 22

WALNUT AVENUE SITE (ENFORCEMENT LEAD)

338 WALNUT AVENUE

ROANOKE, VIRGINIA

ATTN: DENNIS CARNEY, KAREN MELVIN, ERD/OERR

EXTENT OF CONTAMINATION EFFORTS

I. SITUATION (1700 HOURS FRIDAY, APRIL 7, 1995)

- A. SITE WAS FORMERLY KNOWN AS CYCLE SYSTEMS LEAD SITE. THE NAME OF THE SITE HAS BEEN CHANGED TO WALNUT AVENUE LEAD SITE. ALL REFERENCES PREVIOUSLY MADE TO THE CYCLE SYSTEMS SITE SHOULD BE CONSIDERED TO BE PART OF THE WALNUT AVENUE LEAD SITE.
- B. PERSONNEL ON-SITE:  
TAT -1, CYCLE SYSTEMS - 1, ERM - 2,
- C. WEATHER: CLEAR WITH TEMPERATURES IN THE LOW 70'S.
- D. NO FURTHER SAMPLES WILL BE COLLECTED BY ERM IN THE FFA UNTIL THE PROPERTY LINES ARE DISPUTED.

II. ACTIONS TAKEN:

- A. ERM CONTINUED COLLECTING ADDITIONAL LATERAL AND DEPTH SAMPLES. 1 DEPTH SAMPLE TAKEN IN FSA TO DELINEATE EXTENT OF CONTAMINATION.
- B. ERM DROPPED OFF 1 SAMPLE AT ETS LABORATORIES, TO BE ANALYZED FOR TOTAL LEAD AND TCLP.
- C. ANALYTICAL RESULTS WERE RECEIVED FROM 04/06/95 SAMPLING. DEPTH AND SURFACE SAMPLE LEAD LEVELS IN THE FSA WERE ALL < 1000 PPM.
- D. DAILY AIR-MONITORING CONTINUED. NO LEVELS WERE REPORTED ABOVE BACKGROUND.
- E. ERM COLLECTED SAMPLE OF DECON WATER. FOR DISPOSAL, WATER MUST BE ANALYZED FOR TOTAL PETROLEUM HYDROCARBONS (TPH) AND METALS.
- F. SITE DEMOBE.

III. FUTURE ACTIONS

- A. ERM TO RECEIVE LABORATORY RESULTS FROM 04/07/95 SAMPLING.
- B. OSC TO CONTINUE COORDINATION OF REMOVAL ACTIVITIES WITH LOCAL AND STATE OFFICIALS AS WELL AS HANDLING MEDIA AND LOCAL CITIZEN INQUIRIES CONCERNING THE SITE.
- C. ROANOKE'S WATER POLLUTION REPRESENTATIVE SENSABOUGH AND CYCLE SYSTEM'S LOWE TO LOCATE BLUEPRINTS OF FACILITY SO A DESIGNATED SEWAGE SEWER MAY BE LOCATED TO DISPOSE OF DECON WATER.
- D. KOONTZ BRYANT SURVEYORS ONSITE WEEK OF 04/14/95, TO LOCATE SITE PROPERTY BOUNDARIES IN FFA AREA.

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JEFF DODD, OSC  
U.S. EPA REGION III  
WHEELING, WV

<sup>23</sup>  
**Polrep #001**

**Walnut Avenue Lead Site**

338 Walnut Ave., S.E.

Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1500 hours, Friday, October 31, 1997)

- A. This Polrep covers the time period from 10/27-31/97. In terms of background: this Site was previously owned by Roanoke Iron and Steel, until 1986, which fabricated and painted steel for use in prisons.
- B. Assessment conducted in 1987 by Risk Science International revealed elevated levels of lead in soil.
- C. Between January and March 1988, 193,440 pounds of contaminated soil were removed from the Site and transported to GSX Hazardous Waste Facility in Barnwell, SC. Confirmatory samples collected at that time revealed lead levels remaining in soils were below regulatory limits.
- D. Property purchased by Cycle Systems at an auction in March 1988.
- E. After an assessment for the Roanoke River Flood Reduction Project, the Army Corps of Engineers referred the Site to USEPA Region III in January 1994 following the completion of an assessment that was part of the Roanoke River Flood Reduction Project.
- F. Soil and surface water samples collected during an EPA/SATA assessment in February 1994 revealed elevated levels of lead in three areas that had previously used in painting operations performed by Roanoke Iron & Bridge Company. Areas include the Former Painting Area (FPA), the Former Slag Area (FSA), and the Former Drainage Ditch Area (DDA).
- G. EPA drafted an Administrative Order of Consent (AOC) for Cycle Systems to address the delineation and removal of lead contaminated soils above the 1000 mg/kg Regulatory Removal Guideline (RRG).
- H. Site inspections conducted on November 22, 1994 and March 16, 1995 prompted to the US EPA to include the Former Foundry Area (FFA), the River Bank Area (RBA), and the Equipment Storage Area (ESA) in the AOC as well.
- I. Cycle Systems in accordance with the amended AOC dated July 29, 1996, agreed to excavate the contaminated soils, treat the contaminated soils on Site and, transport the treated soils to an approved landfill.

## **II. Actions Taken**

- A. Excavation of ESA was completed. 23 Truckloads or approximately 483 tons of contaminated soil was excavated and stockpiled in FSA/FPA. Eleven confirmatory samples were collected in the ESA and the analytical results showed them to be below the 1000 mg/kg RRG.
- B. DDA excavated and 1 Truckload or 21 tons was stockpiled at FSA/FPA. Analytical results from confirmatory samples showed levels above RRG. Area covered with poly-lining for protection over weekend, awaiting further excavation and sampling.
- C. FFA excavated and 31 Truckloads or 651 tons of contaminated soils which represents approximated 85% completion, was accomplished. Material stockpiled in FSA/FPA. Five confirmatory samples were obtained and analytical results showed values below RRG.
- D. Lead contaminated soil not previously included in AOC was found inside Northeast corner of building along the northern side of the FFA. Samples collected revealed high lead levels in a 50 ft by 50 ft area. Area has to be cleared of equipment and debris material prior to excavating contaminated soil.
- E. Perimeter air monitoring revealed low dust lead levels caused by excavation. Also, personal air monitoring revealed low lead levels in exclusion zone.

## **III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Excavate and re-sample DDA.
- C. Complete excavation and confirmatory sampling of FFA and begin excavation of soil in area found in the NE corner of building by mid-week.
- D. Begin treating previously stockpiled material by mid-week.
- E. OSC and SATA to continue to monitor PRP compliance with AOC.

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Mikal Shabazz, OSC  
US EPA Region III  
Philadelphia, PA



<sup>24</sup>  
**Polrep #00-2**

**Walnut Avenue Lead Site**

338 Walnut Ave., S.E.

Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1300 hours, Friday, November 7, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 EPA; 1 SATA
- C. Weather: Clear and Cold

**II. Actions Taken**

- A. DDA was re-excavated. Confirmation samples revealed levels below the 1000 mg/kg RRG for lead.
- B. Excavated RBA and stockpiled at FSA/FPA. Analytical results from confirmatory samples showed levels above RRG for lead.
- C. FFA excavation completed. Material stockpiled in FSA/FPA. Confirmatory samples were obtained and analytical results showed lead values above RRG.
- D. The Forrester lead On-Site treatment process arrived on Wed, 11/5/97. Process involves a combination of employing sulfuric and phosphoric acid to transform lead into lead phosphate which is a non-hazardous and non-leachable lead compound. Forrester engineer was on-Site to oversee and run the treatment process for lead contaminated soil.
- E. Approximately 150 tons of lead contaminated soil has been processed and treated.
- F. Eight samples of treated material were obtained and analyzed to verify effectiveness of the treatment process prior to transport for disposal.
- G. Four truckloads, approximately 72 cubic yards, of treated soil have been transported to USA Waste in Amelia, VA for disposal.

**III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FFA and RBA.



- C. Start excavation and confirmatory sampling of soil in area found in the NE corner of building.
- D. Continue treating previously stockpiled material.
- E. Continue to transport treated materials to USA Waste for disposal.
- F. Continue to monitor PRP compliance with AOC.

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US EPA Region III  
Philadelphia, PA

25  
Polrep #003-

Walnut Avenue Lead Site

338 Walnut Ave., S.E.  
Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

I. **Situation:** (As of 1300 hours, Friday, November 14, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Cold and Cloudy with occasional rain

II. **Actions Taken**

- A. FFA re-excavated. Confirmation samples revealed lead levels below the 1000 mg/kg RRG.
- B. RB5-15 re-excavated. Confirmation samples revealed lead levels above RRG.
- C. Excavation of underroof FFA completed. Confirmation samples revealed lead levels above RRG. Area re-excavated to twelve inches, and resampled. Several confirmation samples revealed lead levels below RRG.
- D. Excavation of FSA/FPA. River bank and building stability prohibit further excavation along riverbank. Cycle Systems to consult with OSC concerning large amounts of paint mixed with slag turnings found in this area.
- E. Forty-eight truckloads, approximately 1200 tons of treated soil, have been transported to USA Waste, Amelia, VA for disposal.
- F. Fourteen post treatment samples collected to verify effectiveness of treatment process prior to transport to USA Waste. All were negative, below 5 ppm lead.

III. **Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Continue excavation and confirmation sampling of FSA/FPA.
- C. Continue treatment of contaminated soils and post treatment analysis.

- D. Transportation of treated materials to USA Waste, for disposal.
- E. Continue monitoring compliance with AOC.

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Mikal Shabazz, OSC  
US EPA Region III  
Philadelphia, PA

<sup>26</sup>  
**Polrep #004**

**Walnut Avenue Lead Site**

338 Walnut Ave., S.E.  
Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1300 hours, Friday, November 21, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Clear and Cold

**II. Actions Taken**

- A. RBS-15 again re-excavated. Confirmation samples revealed levels above the 1000 mg/kg RRG for lead. Area will be re-excavated.
- B. Excavated FSA/FPA along riverbank. Analytical results from confirmatory samples showed levels above RRG for lead. Area will be re-excavated
- C. OSC explained the need for considering a deed restriction on the FSA/FPA portion of the Site if the building's or river bank's stability was threatened because of the excavation.
- D. An area in the FSA/FPA along the river bank was found to have a large volume of lead paint and lead paint container carcasses. Huggins and Associates, Cycle Systems' consultant, is evaluating the disposal/treatment options for this material including crushing the chunks of lead paint into smaller pieces and treating the crushed material with the Forrester lead On-Site treatment process.
- E. Thus far, 115 truckloads of treated material have been transported to USA Waste, located in Amelia, VA, including 63 truckloads this week.
- F. Eight samples of post-treated material were obtained and analyzed to verify effectiveness of the treatment process prior to transport for disposal. All results were below 5 ppm lead.

**III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FFA, FPA and RBA.

- C. Continue treating previously stockpiled material and post-treatment confirmation analysis prior to transport for disposal.
- D. Continue to transport treated materials to USA Waste for disposal.
- E. Continue to monitor PRP compliance with AOC.

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US EPA Region III  
Philadelphia, PA



<sup>27</sup>  
**Polrep #005-**

**Walnut Avenue Lead Site**

338 Walnut Ave., S.E.  
Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1300 hours, Wednesday, November 26, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Clear and Cold with temperatures in the low to mid 40's.

**II. Actions Taken**

- A. Confirmation samples from FSA/FPA along river bank still revealed levels above the 1000 mg/kg RRG for lead. Area will be re-excavated.
- B. "Overs" pile, i.e., pile with chunks of lead paint, were processed at the Forrester treatment unit. Awaiting results from post-treatment analysis.
- C. Thus far, 132 truckloads of treated material have been transported to USA Waste, located in Amelia, VA, including 17 truckloads this week.
- D. Seven samples of post-treated material were obtained and analyzed to verify effectiveness of the treatment process prior to transport for disposal. All results were below 5 ppm Pb.

**III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FFA and FPA.
- C. Continue treating previously stockpiled material and post-treatment confirmation analysis prior to transport for disposal.
- D. Continue to transport treated materials to USA Waste for disposal.
- E. Continue to monitor PRP compliance with AOC.

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Mikal Shabazz, OSC  
US EPA Region III  
Philadelphia, PA

ORIGINAL  
(Red)

**Polrep #028**

**Walnut Avenue Lead Site (aka Cycle Systems)**

338 Walnut Ave., S.E.

Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1300 hours, Friday, December 5, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Cold with temperatures in the upper 30's to mid 40's.

**II. Actions Taken**

- A. Trucks delivered soil to be used as backfill in "clean areas".
- B. FSA/FPA drum storage area excavated. All visible lead-paint contamination removed. Awaiting post-removal confirmation results.
- C. FSA/FPA riverbank segment confirmation sample results showed lead levels below 1000 ppm RRG. Area was backfilled with clean soil.
- D. Seven samples of post-treated material were obtained and analyzed to verify effectiveness of the treatment process prior to transport for disposal. All results were below 5 ppm Pb.
- E. Twelve post-treatment samples were collected to verify effectiveness of treatment process prior to transport to USA Waste for disposal.

**III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FSA and FPA.
- C. Continue treating previously stockpiled material and post-treatment confirmation analysis prior to transport for disposal.
- D. Continue to transport treated materials to USA Waste for disposal.

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US EPA Region III  
Philadelphia, PA

**Polrep #028**

**Walnut Avenue Lead Site (aka Cycle Systems)**

338 Walnut Ave., S.E.

Roanoke, VA

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1300 hours, Friday, December 5, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Cold with temperatures in the upper 30's to mid 40's.

**II. Actions Taken**

- A. Trucks delivered soil to be used as backfill in "clean areas".
- B. FSA/FPA drum storage area excavated. All visible lead-paint contamination removed. Awaiting post-removal confirmation results.
- C. FSA/FPA riverbank segment confirmation sample results showed lead levels below 1000 ppm RRG. Area was backfilled with clean soil.
- D. Seven samples of post-treated material were obtained and analyzed to verify effectiveness of the treatment process prior to transport for disposal. All results were below 5 ppm Pb.
- E. Twelve post-treatment samples were collected to verify effectiveness of treatment process prior to transport to USA Waste for disposal.

**III. Future Actions**

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FSA and FPA.
- C. Continue treating previously stockpiled material and post-treatment confirmation analysis prior to transport for disposal.
- D. Continue to transport treated materials to USA Waste for disposal.

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**Polrep #029**

**Walnut Avenue Lead Site (a.k.a. Cycle Systems)**

338 Walnut Ave., S.E.

Roanoke, VA

ORIGINAL  
(Red)

Attn: Karen Melvin, Dennis Carney and RRC

**I. Situation:** (As of 1500 hours, Thursday, December 11, 1997)

- A. Continuing to monitor PRP compliance with AOC.
- B. Personnel on Site: 1 SATA
- C. Weather: Cold and overcast with occasional rain.

**II. Actions Taken**

- A. FSA/FPA drum storage area confirmation samples below 1000 ppm RRG for lead.
- B. Excavation of FSA/FPA former stockpile area. Initial confirmation samples revealed levels above RRG. Further excavation continued and awaiting second confirmation sample results.
- C. "Overs" pile free of lead paint and fine materials so that it can be used as backfill in FSA/FPA.
- D. 58 truckloads this week, totaling 257 truckloads thus far, have been transported to USA Waste in Amelia, VA for disposal..
- E. Six post treatment samples collected to verify effectiveness of treatment process prior to transport to USA Waste for disposal.
- F. SATA along with Huggins and Draper and Adam conducted a final Site walkthrough to verify each of the areas identified as lead-contaminated areas have been excavated and that the contaminated soil was treated in accordance with the AOC.
- G. SATA demobilizes from the Site at 1500 hours on December 11, 1997.

ORIGINAL  
(Red)

### III. Future Actions

- A. Continue perimeter and personal air monitoring as necessary.
- B. Re-excavate and re-sample FSA / FPA former stockpile area.
- C. Continue treating previously stockpiled material and post-treatment confirmation analysis prior to transport for disposal.
- D. Continue to transport treated materials to USA Waste for disposal.
- E. Cycle Systems is to forward to OSC/SATA all future confirmation sample results and completion reports.

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